

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JUNE CULROSS

Plaintiff,

v.

FALLON CLINIC, INC. and
MARLENE DODGE

Defendants.

C. A. No. 05-40092FDS

**ASSENTED TO JOINT MOTION TO EXTEND THE TIME FOR DEFENDANTS TO
FILE A RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT**

The Parties hereby submit this Joint Motion To Extend The Time For Defendants To File A Responsive Pleading to Plaintiff's Complaint ("Joint Motion"). In support of this Joint Motion, the parties state as follows:

1. By this action, the Plaintiff alleges that Defendants violated the Family Medical and Leave Act ("FMLA") and M.G.L. c. 151B. Specifically, Plaintiff alleges that Defendants interfered with the exercise of her rights pursuant to the FMLA and discriminated against her on the basis of her alleged handicap.
2. Presently, the deadline for filing a responsive pleading to Plaintiff's Complaint is July 25, 2005.
3. Since receiving Complaint, counsel for the Parties have discussed the possibility of settling the case.
4. Currently, the attorneys are exploring the possibility and parameters, of a possible settlement. The Parties anticipate continuing these discussions for the near future.

5. Because the Parties intend to engage in good faith settlement negotiations, and because they also wish to avoid unnecessary time and expense related to this matter, the Parties have agreed that Defendants need not file a responsive pleading until settlement negotiations have been pursued more fully.

6. Because the Parties' counsel will be unavailable for different periods of the summer, this process may take longer than usual.

7. Accordingly, the Parties request that the deadline for submission of a responsive pleading be extended to August 30, 2005.

8. The Parties will not be prejudiced by this extension.

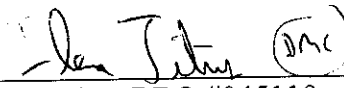
WHEREFORE, the Parties respectfully request that the Court extend the time for Defendants to file a responsive pleading to August 30, 2005.

FALLON CLINIC, INC. and
MARLENE DODGE
By their attorneys,



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JUNE CULROSS
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Dated: July 22, 2005